

**REMARKS/ARGUMENTS**

By this Amendment, no claims are canceled, claims 30-32 are amended and no claims are added. Claims 26-33 and 38-40 are pending.

Favorable reconsideration is respectfully requested in view of the foregoing amendments and the following remarks.

The Examiner sets forth that should Applicant desire to obtain the benefit of priority under 35 U.S.C. 119(a)-(d), **a certified English translation of the foreign application must be submitted.** The Examiner also sets forth that failure to provide a certified translation may result in no benefit being accorded for the non-English application. Furthermore, according to the Examiner Rule 1.55 (a) (3) states that the Office may require that the claim for priority and the certified copy of the foreign application be filed earlier than provided in paragraphs (a)(1) or (a)(2) of that section when necessary to overcome the date of a reference relied upon by the Examiner. Further, according to the Examiner, an English language translation of a non-English language application is not required except ... when necessary to overcome the date of a reference relied upon the Examiner or when specifically required by the Examiner and **if an English language translation is required, it must be filed together with a statement that the translation of the certified copy is accurate.**

Accordingly, a certified English translation of the non-English language application priority document is filed herewith.

Therefore, the effective filing date of the present application predates the filing date of the Chang application (i.e., present application effective filing date October 23, 2002 versus the

Chang filing date of December 24, 2002). Thus, Chang is not a valid prior art reference. As a result, Applicant respectfully submits that the claim rejections should be withdrawn by the Examiner.

Smith discloses a threaded text discussion or chat system. A threaded discussion message pane 72 renders messages in a threaded or tree structure (4:57-58). The Applicant notes that the Examiner cites Smith as teaching the identification of an association between documents in a thread in a virtual document, as a tree structure, and selectively realizing the expansion condition of the thread in the virtual document, based on the tree structure. The Examiner believes that Smith teaches identifying an association between the documents in a thread in the virtual document, as a tree structure, and selectively realizing the expansion condition of the thread in the virtual document, based on the tree structure. Smith fails to disclose generating a virtual document from the group of documents as recited in independent claim 26. Instead, Smith merely displays chat messages in a thread. As a result, Smith has no need for, and also fails to disclose, selecting the relationship for a group of documents, or forming a section group that includes the group of documents. Therefore, Smith fails to disclose all of the elements recited in claim 26. Claim 26 is therefore believed to be patentable over Smith. Claims 27-33 are dependent from claim 26 and are therefore believed to be patentable over Smith for at least the same reasons as claim 26.

Claim 38 is also patentable over Smith. For example, Smith does not disclose mapping a plurality of documents into a virtual document as required by independent claim 38. Claims 39-

40 are dependent from claim 38 and patentable over Smith for at least the same reasons as claim 38, and for additional reasons.

For at least the reasons set forth above, it is respectfully submitted that the above-identified application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are respectfully requested.

Should the Examiner believe that anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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Please charge or credit our  
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